

APPENDIX A

Appendix A — Proposed Claim Constructions*Genoa Color Technologies, Ltd. v. Samsung Electronics Co., Ltd., et al.*

Patent Claims	Terms for Construction	Defendants' Proposed Construction	Plaintiff's Proposed Construction
<p>1. A method of producing a color image comprising:</p> <p>projecting polychromatic light from a light source onto a first side of a color wheel having at least four non-white and non-black color filters;</p> <p>rotating said color wheel such that the polychromatic light from said light source is sequentially filtered by transmission through said at least four color filters to sequentially produce at a second side of said color wheel, opposite said first side, light of at least four colors, each of said at least four colors having a different chromaticity from the others of the at least four colors; and spatially modulating said light of at least four colors in accordance with a data signal to produce said color image.</p> <p>2. The method of claim 1, wherein each of said at least four light colors is produced at least once during one rotation of said color wheel.</p> <p>3. The method of claim 1, further comprising operating a motor attached to said color wheel for rotating said color wheel.</p> <p>4. The method of claim 1, further comprising projecting said filtered light onto a viewing screen.</p> <p>5. The method of claim 1, wherein said spatially modulating said light comprises selectively activating a spatial light modulator in accordance with said data signal.</p> <p>6. The method of claim 5, wherein said spatial light modulator is a digital micro-mirror device (DMD).</p> <p>7. The method of claim 5, wherein said selectively activating said spatial light modulator comprises activating said spatial light modulator to sequentially modulate the light of said at least four different colors in accordance with said data signal.</p> <p>8. The method of claim 1, further comprising</p> <p>converting three-color data representing said color image in terms of three colors into converted image data representing said color image in terms of said at least four different colors.</p> <p>9. The method of claim 8, further comprising: receiving image data representing said color image in terms of said at least four colors; and</p> <p>generating a formatted data signal including a sequence of color data arrays, each array including data representing at least part of said image data corresponding to one of said at least four colors.</p> <p>10. The method of claim 9, wherein said spatially modulating said light comprises selectively activating a spatial light modulator based on said formatted data signal to produce a light pattern corresponding to said color image.</p>	<p>“color image” [claims 1, 8, 9, 10]</p>	<p>“image comprised of at least one color”</p>	<p>“an image including a plurality of pixels, at least some of which are made up of at least four non-white and non-black colors”</p>
	<p>“data signal” [claims 1, 5, 7, 9]</p>	<p>“a signal that carries data”</p>	<p>“a signal representing an image in terms of a plurality of pixels, each having exactly three component values, e.g., RGB, XYZ, YCC, etc.”</p>
	<p>“converting” [claim 8]</p>	<p>Samsung Defendants:</p> <p>“partitioning the color gamut to transform”</p>	<p>“transforming”</p>
		<p>Mitsubishi Defendants:</p> <p>“transforming”</p>	
	<p>“three-color data representing said color image in terms of three colors” [claim 8]</p>	<p>Relevant terms have either (1) already been construed (<i>e.g.</i>, “color image”) or (2) consist of words needing no construction or a plain meaning construction (<i>e.g.</i>, “three” means “three”).</p>	<p>“an image represented by a plurality of pixels, each having exactly three component values”</p>

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<p>1. A method of producing a color image comprising:</p> <p>projecting polychromatic light from a light source onto a first side of a color wheel having at least four non-white and non-black color filters;</p> <p>rotating said color wheel such that the polychromatic light from said light source is sequentially filtered by transmission through said at least four color filters to sequentially produce at a second side of said color wheel, opposite said first side, light of at least four colors, each of said at least four colors having a different chromaticity from the others of the at least four colors; and spatially modulating said light of at least four colors in accordance with a data signal to produce said color image.</p> <p>2. The method of claim 1, wherein each of said at least four light colors is produced at least once during one rotation of said color wheel.</p> <p>3. The method of claim 1, further comprising operating a motor attached to said color wheel for rotating said color wheel.</p> <p>4. The method of claim 1, further comprising projecting said filtered light onto a viewing screen.</p> <p>5. The method of claim 1, wherein said spatially modulating said light comprises selectively activating a spatial light modulator in accordance with said data signal.</p> <p>6. The method of claim 5, wherein said spatial light modulator is a digital micro-mirror device (DMD).</p> <p>7. The method of claim 5, wherein said selectively activating said spatial light modulator comprises activating said spatial light modulator to sequentially modulate the light of said at least four different colors in accordance with said data signal.</p> <p>8. The method of claim 1, further comprising</p> <p>converting three-color data representing said color image in terms of three colors into converted image data representing said color image in terms of said at least four different colors.</p> <p>9. The method of claim 8, further comprising: receiving image data representing said color image in terms of said at least four colors; and</p> <p>generating a formatted data signal including a sequence of color data arrays, each array including data representing at least part of said image data corresponding to one of said at least four colors.</p> <p>10. The method of claim 9, wherein said spatially modulating said light comprises selectively activating a spatial light modulator based on said formatted data signal to produce a light pattern corresponding to said color image.</p>	<p>“[converting three-color data representing said color image in terms of three colors into]¹ converted image data representing said color image in terms of said at least four different colors” [claim 8]</p>	<p>Relevant terms have either (1) already been construed (<i>e.g.</i>, “color image”) or (2) consist of words needing no construction or a plain meaning construction (<i>e.g.</i>, “three” means “three”).</p>	<p>““converting three color data ... into converted image data” means, for every pixel in the input data, transforming each three-component pixel into a pixel having at least four (potentially non-zero) colors, each of the at least four colors corresponding to a non-white and non-black filter.”</p>
	<p>“polychromatic light” [claim 1]</p>	<p>“light consisting of a plurality of colors or spectral wavelengths”</p>	<p>“light including a plurality of wavelengths”</p>
	<p>“spatially modulating” [claims 1, 5, 10]</p>	<p>“varying in space”</p>	<p>“varying the intensity and/or color and/or angular distribution and/or polarization of light as a function of spatial position”</p>
	<p>“produce said color image” [claim 1]</p>	<p>“Color image” has already been construed. The term “produce” needs no construction. If construed, though, the phrase should mean “create a color image.”</p>	<p>“construct an image from a plurality of pixels, at least some of which are made up of at least four non-white and non-black colors”</p>
	<p>“selectively activating” [claims 5, 7, 10]</p>	<p>The term should not be construed. If construed, should mean “varying the operation of.”</p>	<p>“controlling the individual pixels of”</p>
	<p>“digital micro-mirror device (DMD)” [claim 6]</p>	<p>“arrangement of mirrors each of which can reflect light either toward or away from the display screen”</p>	<p>“a two-dimensional arrangement of mirrors, each of which has at least two orientations, each of which orientations reflects light in a different direction”</p>

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	<p>“array(s)” [claim 9]</p>	<p>“arrangement(s) of rows and columns”</p>	<p>“multi-dimensional data structures or arrangements of data”</p>

¹ Genoa's brief proposes construing the claim language after this footnote. Genoa's proposed definition, however, additionally suggests construing the bracketed text.